

IN THE UNITED STATES DISTRICT COURT FOR
THE MIDDLE DISTRICT OF ALABAMA

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JOE RANGER PICKETT, #28361
Full name and prison number
of plaintiff(s)

v.

CIVIL ACTION NO. 2:05cv924-T
(To be supplied by Clerk of
U.S. District Court)BOB RILEY, DONALD CAMPBELL, LEEPOSEY DANIELS,DONALD ADAMS, FRANKLIN BROWN, Michelle Ellington,Roderick Brewton, Demetrious HOLSTICK, Ugrove,Kimbrough, William Howard and TerranceMcDonnellName of person(s) who violated
your constitutional rights.
(List the names of all the
persons.)

I. PREVIOUS LAWSUITS

- A. Have you begun other lawsuits in state or federal court dealing with the same or similar facts involved in this action? YES (☒) NO (☐)
- B. Have you begun other lawsuits in state or federal court relating to your imprisonment? YES (☐) NO (☐)
- C. If your answer to A or B is yes, describe each lawsuit in the space below. (If there is more than one lawsuit, describe the additional lawsuits on another piece of paper, using the same outline.)

1. Parties to this previous lawsuit:

Plaintiff(s) Carl Moore, et al.Defendant(s) Bob Riley, et al.2. Court (if federal court, name the district; if state court, name the county) MIDDLE DISTRICTOF Alabama

3. Docket number 2:05-CV-669-F
4. Name of judge to whom case was assigned U.S.
Magistrate Charles S. Coody
5. Disposition (for example: Was the case dismissed? Was it appealed? Is it still pending?) Plaintiff
was Stricken as Plaintiff by U.S. Magistrate Coody
6. Approximate date of filing lawsuit On or about July 2005
7. Approximate date of disposition 7-26-05

II. PLACE OF PRESENT CONFINEMENT Kilby Correctional Facility, P.O.
Box 150, Mt. Meigs, Alabama 36057-0150

PLACE OF INSTITUTION WHERE INCIDENT OCCURRED Montgomery Comm-
unity Work Center in conjunction with Kilby Correctional Facility all ALDOC.

III. NAME AND ADDRESS OF INDIVIDUAL(S) YOU ALLEGE VIOLATED YOUR CONSTITUTIONAL RIGHTS.

	NAME	ADDRESS
	BOB RILEY	State Capital, 600 Dexter Avenue, Room N-103, Montgomery, AL 36130
1.	DONALD CAMPBELL	64 N. Union Street, Montgomery, AL 36130
	LEE ROSEY DANIELS,	P.O. Box 75, Mt. Meigs, AL 36057
2.	FRANKLIN BROWN	P.O. Box 75, Mt. Meigs, AL 36057
	TERRANCE McDONNELL,	P.O. Box 150, Mt. Meigs, AL 36057-0150
3.	MICHELLE ELLINGTON,	P.O. Box 75, Mt. Meigs, AL 36057
	RODERICK BREWTON,	P.O. Box 75, Mt. Meigs, AL 36057
4.	DEMETRIUS HOLSTICK,	P.O. Box 75, Mt. Meigs, AL 36057
	DONALD ADZIR,	P.O. Box 75, Mt. Meigs, AL 36057
5.	CLARENCE KIMBROUGH,	P.O. Box 75, Mt. Meigs, AL 36057
6.	WILLIAM HOWARD,	P.O. Box 75, Mt. Meigs, AL 36057

IV. THE DATE UPON WHICH SAID VIOLATION OCCURRED January 30, 2004
and continuously

V. STATE BRIEFLY THE GROUNDS ON WHICH YOU BASE YOUR ALLEGATION THAT YOUR CONSTITUTIONAL RIGHTS ARE BEING VIOLATED:

GROUND ONE: Defendants Riley, Campbell, Daniels, McDonnell in conspiracy with
other defendants herein violated Plaintiff Eighth and Fourteenth Amendment of the
U.S. Constitution to be free from overcrowded health hazard imminent danger conditions.

Defendants Riley Governor, Campbell Commissioner, Daniels Warden, McDonnell Warden
acted in concert to violate and interfere with Plaintiff Eighth and Fourteenth Amend-
ment Rights of the United States Constitution by forcing Plaintiff to live in overcrowded
dilapidated Montgomery Community Work Center and Kilby Correctional Facilities with broken
down plumbing with colonization prison drinking water coupled with human feces leaking through the
old unseal concrete floors and 4 stopped up fac boards for 90 inmates, and lack of security with unwarranted beatings,
GROUND TWO: Defendants Brown, Adair, Ellington, Brewton, Holstick, Kimbrough and (of inmates)

William Howard acting under color of State law conspired to violate Plaintiff Fourteenth Amendment, fail to
to follow Standard Operation Procedure as required by Admin. Reg. #403, §14-3-13 Code of Alabama (1975).
SUPPORTING FACTS: Defendants Brown, Howard, Kimbrough and Adair acted in

Concert to violate Plaintiff on April 29, 2005, May 28, 2005 used an altered
Criminal forged disciplinary document for an allege Rule 90 violation to
punitive and maliciously prosecute Plaintiff in violation of their own
Standard operation procedure Admin. Reg. #403 for ALDOC governing 10 days service

of process and only 1 re-initiation to shield defendant Howard Criminal Forgery of PO
K. Woods name who was the arresting officer in the process. Defendant Brown illegally admin. oaths.
GROUND THREE: Defendants Brewton, Ellington, Adair and Holstick violated

their own stand operation procedure of Admin. Reg. #403, used tampered urine sample and illegally
administer oaths to maliciously prosecute Plaintiff for punitive transfer in violation of Plaintiff 4th and 14th.
SUPPORTING FACTS: On 6, 2005, defendant Brewton and Holstick acted in concert

taking a urine sample from Plaintiff in one cup, then defendant Holstick poured Plaintiff urine
in another cup and stuck a sure drug test strip in the without the temperature seal, and on July 27, 2005,
defendant Ellington without authorization illegally administered oaths and subsequently
found Plaintiff guilty even though Admin. Reg. #403 requirements had not been met coupled with tampered
urine. On July 27, 2005, the same defendant Adair approved the illegal process in violation of Plaintiff
Due Process, and Plaintiff was punitively transferred to Kilby Corr. Fac. and stripped of
his minimum custody status to medium. No state shall deprive any person their liberty
interest without Due Process of law. U. S. Const. Amend. §14.1. 6 LEd. 2d 1230 (1966).

VI. STATE BRIEFLY EXACTLY WHAT YOU WANT THE COURT TO DO FOR YOU. MAKE NO LEGAL ARGUMENT. CITE NO CASES OR STATUTES.

Plaintiff seek a preliminary injunction restraining order to defendant stop immediately housing Plaintiff at dilapidated imminent danger over 20 years old Kilby, stop retaliation, expunge punitive disciplinarys used to punitively transfer Plaintiff to a medium custody etc. without due process. Jury trial, Fed. Crim. Prosecution for interfering with Plaintiff Civil Rights. For punitive treatment, Plaintiff seek \$150,000.00 in damages for loss of rights. 8th and 14th U.S. Const. Amend. And Attorney Fees.

Joe Ranger Pickett, #128361
signature of plaintiff(s)

I declare under penalty of perjury that the foregoing is true and correct.

EXECUTED on 9-26-05
(Date)

Joe Ranger Pickett, #128361
signature of plaintiff(s)